

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
Plaintiff,)
)
v.)
)
27. ROBERT AVITABILE,)
A/K/A "BOBBY,")
Defendant.)

FILED EX PARTE AND UNDER SEAL

Criminal No.: 19-10459-RWZ

MOTION TO UNSEAL

The United States, by and through its attorney, Andrew E. Lelling, United States Attorney for the District of Massachusetts, hereby moves to unseal the following documents:

- 1) United States' Motion to Seal dated December 4, 2019;
- 2) Motion for *Lis Pendens* filed on December 4, 2019;
- 3) Motion for Restraining Order filed on December 4, 2019;
- 4) Memorandum of Law in Support of Motion for Restraining Order;
- 5) Proposed *Lis Pendens*;
- 6) Proposed Restraining Order;
- 7) *Lis Pendens* issued on December 5, 2019;
- 8) Restraining Order issued on December 5, 2019; and
- 9) the herein Motion to Unseal.

As grounds, therefore, the United States submits that the documents above have been properly served and/or recorded. Accordingly, there is no longer a risk that disclosure of the documents could result in the alienation, dissipation, transfer, or assignment of the assets subject to forfeiture.

WHEREFORE, the United States respectfully requests that this Court unseal only the above-referenced documents.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

By: /s/ Carol E. Head
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Dated: December 6, 2019

SO ORDERED:

RYA W. ZOBEL
Senior United States District Judge

Dated: _____